

42234

13 6

0001

Sites:	_____
Break:	13.6
Others:	_____

Community Involvement Plan

**Brown's Dump
Jacksonville, Duval County, Florida**

**Prepared for
U.S. Environmental Protection Agency, Region 4
under
EPA Work Assignment No. 007-RSBD-A496**

**Prepared by
Black & Veatch Special Projects Corp.
Project N° 48107.202**

February 17, 2000

Contents

1.0 Introduction and Overview of Plan	1
2.0 Site Description	2
2.1 Site Location	2
2.2 Site History	2
2.3 Previous Site Investigation	5
2.4 Planned Superfund Activities	7
3.0 Community Profile	8
3.1 Local Government Structure	8
3.2 Community Characteristics	8
4.0 History and Analysis of Community Concerns	11
4.1 Chronology of Community Involvement	11
4.2 Key Community Issues and Concerns	13
4.2.1 Low Trust in Public Agencies	13
4.2.2 Health Effects	14
4.2.3 Economic and Community Effects	15
4.2.4 Environmental Justice	15
4.2.5 Cleanup Standards	16
4.2.6 Communication Issues	16
5.0 Community Involvement Program	18
5.1 Goals	18
5.2 Objectives	18
5.3 Key Messages	19
5.4 Target Audiences	19
5.5 Community Involvement Activities	19
5.5.1 EPA Contacts	20
5.5.2 Prepare and Maintain Site Mailing List	20
5.5.3 Distribute Fact Sheets / Site Updates	21
5.5.4 Hold Public Meetings / Availability Sessions	21
5.5.5 Coordinate with Technical Assistance Plan Recipient and Advisor	21
5.5.6 Hold Comment Period and Respond to Comments	21
5.5.7 Provide Timely and Accurate Information to the News Media	22
5.5.8 Maintain an Information Repository	22
5.5.9 Other Sources of Information	22
5.6 Evaluation and Revision of Community Involvement Program	23
5.7 Implementation Schedule	23
6.0 References	25

Contents (Continued)

Table

Table 1	Implementation Schedule	23
---------	-------------------------------	----

Figure

Figure 1	Site Location Map	3
Figure 2	Detailed Site Area Map	4

Appendices

Appendix A	Key Contacts	A-1
A.	Federal Elected Officials	A-1
B.	State Elected Officials	A-1
C.	Local Elected Officials	A-2
D.	Agency Representatives	A-2
E.	Local Organizations	A-3
F.	News Media	A-5
Appendix B	Location of Information Repository and Administrative Record File	B-1
Appendix C	Locations for Public Meetings and Meeting Support Services	C-1
Appendix D	Description of Superfund Process	D-1
Appendix E	Seven Cardinal Rules of Risk Communication	E-1
Appendix F	Glossary	F-1

1.0 Introduction and Overview of Plan

This **community involvement plan*** provides background information and describes community interests and concerns related to the former Brown's Dump site located in Jacksonville, Florida. The plan also establishes a framework for community involvement and outlines activities to be conducted by the United States Environmental Protection Agency (EPA) during the **remedial investigation and feasibility study** at the site.

Under the **Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA)**, also known as **Superfund**, EPA investigates and develops **cleanup** remedies for hazardous waste sites that pose an immediate or long-term threat to human health and the environment. EPA's Superfund community involvement program is intended to foster positive and ongoing dialogue with communities surrounding Superfund sites. Community involvement activities are designed to keep the public informed during the Superfund process and to give residents, interested groups, and local officials opportunities to provide input on EPA long-term plans for a site.

The remaining sections of this plan include:

- Site Description.
- Community Profile.
- History and Analysis of Community Concerns.
- Community Involvement Program.

Appendices provide the following information:

- Key Contacts.
- Location of **Information Repository and Administrative Record File**.
- Suggested Locations for Public Meetings.
- Explanation of the Superfund Process.
- Seven Cardinal Rules of Risk Communication.
- Glossary.

* Words in bold face print appear in the glossary in Appendix F.

2.0 Site Description

2.1 Site Location

The former Brown's Dump site is located in the northwest portion of the city of Jacksonville in Duval County, Florida. The site occupies approximately 50 acres and is generally bounded by 33rd Street on the south, Pearce Street on the east, and Moncrief Creek to the north and west (Figure 1). Portions of the site are occupied by the Mary McLeod Bethune Elementary School and its grounds, a Jacksonville Electric Authority (JEA) substation, and residential areas, including the Bessie Circle Apartments to the west of the school and the Moncrief Village and Palm Terrace Apartment complexes in the northeast part of the site (Figure 2).

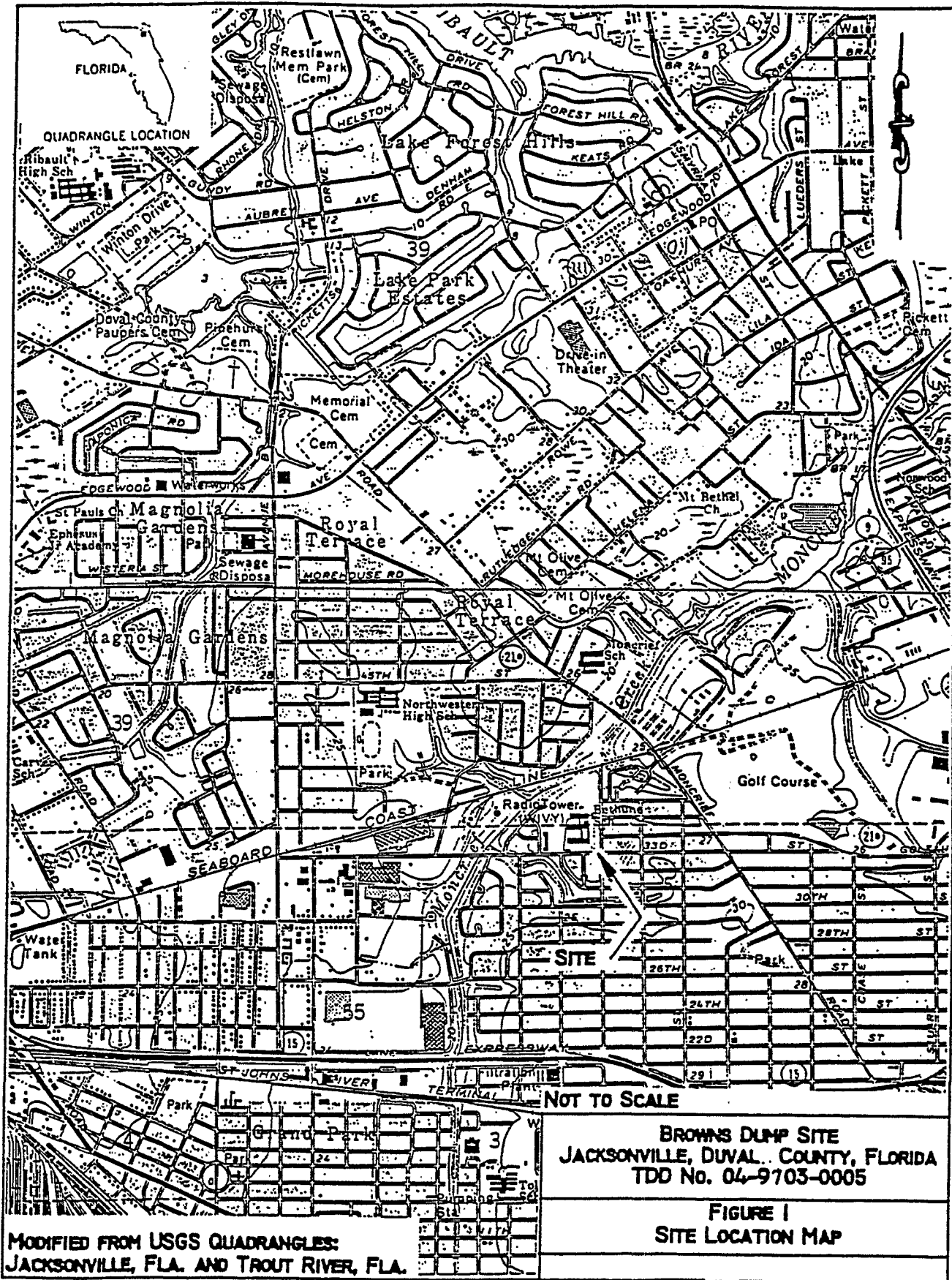
2.2 Site History

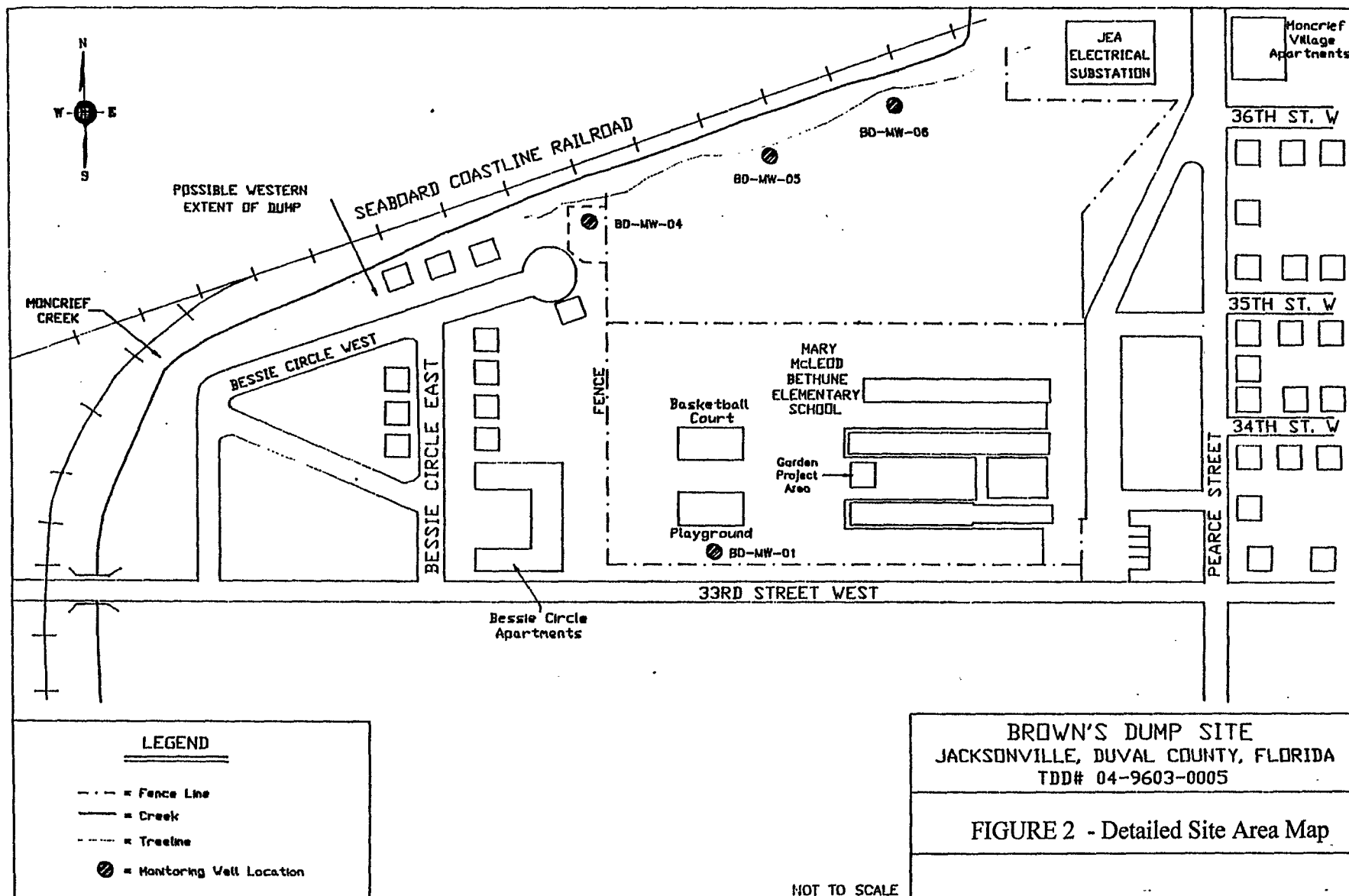
The site area and additional land south of 33rd Street were formerly owned by the family of Clinton Brown. Mr. Brown operated a landfill at the site location from the 1940s to the early 1950s. Mr. Brown reported that the family used the land for hog farming before and after the dumping activities. The City of Jacksonville used Brown's Dump to dispose of ash from its municipal solid waste incinerators. The City reportedly also dumped raw waste when the incinerators were not operating, and other parties reportedly disposed of waste at Brown's Dump.

In 1955, approximately 14 acres of the site were obtained by the Duval County School Board through condemnation procedures. The dump was backfilled, and construction of the Mary McLeod Bethune Elementary School started soon afterward at the corner of Pearce and 33rd Streets. The school was named for Mary McLeod Bethune, a national figure who lived from 1887 to 1955. Bethune was the daughter of former slaves and became a highly respected educator, architect of a strong African-American women's movement, and presidential advisor.

A two-acre portion north of the school on Pearce was obtained by the JEA for construction of an electrical substation. Apartments and single-family residential areas were built at different times on and near the site, around the school and JEA facilities.

Ash waste, visually identified by the presence of glass and metal fragments, has been and can still be found at the 50-acre site. Layers of ash containing lead and other contaminants are present in various areas across the site. The layers apparently range from inches to several feet in thickness and at depths varying from the ground surface to 20 or more feet below.





13 6 0006

Over the years, general public awareness of the site's past use as a dump has faded. However, the Duval County School Board has reportedly deferred improvements at Mary McLeod Bethune Elementary School due to concerns about disturbing contaminated soil. In 1985, after receiving information about potential contamination from the former Brown's Dump, EPA initially investigated the site.

2.3 Previous Site Investigations

EPA performed a **preliminary assessment** and **site inspection** at the Brown's Dump site in 1985. Environmental samples were taken to evaluate the risk associated with the site using EPA's **Hazard Ranking System (HRS)**. An HRS score for groundwater and surface water migration pathways was calculated for Brown's Dump and it scored lower than 28.5. If a site's HRS score is above 28.5, the site is considered a high priority and can be considered for the **National Priorities List (NPL)**. With a score lower than 28.5, the site was therefore considered a low priority.

EPA's HRS was nationally revised in the mid-1990's and all sites that previously scored as low priorities were reevaluated. Brown's Dump was reevaluated in 1994 and scored above 28.5 for groundwater and soil exposure pathways. The additional soil exposure pathway evaluation gave the site a much higher HRS score, resulting in a high priority site ranking.

Early in 1995, the Emergency Response and Removal Branch of EPA assessed Brown's Dump and confirmed elevated contaminant levels at the site. EPA recommended a portion of the site north of the school be fenced and posted with warning signs to prevent contact with the most contaminated soils. EPA also recommended more detailed study of the site, and agreed that the Florida Department of Environmental Protection (FDEP) should take the lead, including any necessary enforcement actions, to investigate and clean up the site.

At FDEP's direction, the Duval County School Board analyzed numerous samples from the site and prepared a Contamination Assessment Report summarizing the results. A 1996 addendum to the report detailed additional sampling and interim measures taken at the school property. Six inches of soil were applied to specified areas of the school grounds and near some residences. New fencing was installed and existing fencing was repaired. By mid-1996, areas of ash contamination were identified on and beyond the school property in residential areas to the south, west, and northeast, and to the north across Moncrief Creek.

In July 1996, the City of Jacksonville tested blood samples from children attending the school and/or living near the site to determine the levels of lead in their blood. Those results showed no apparent effects from lead exposure in the Brown's Dump area. The City's Health Evaluation recommended

continuing blood lead testing and taking steps to increase community awareness about lead hazards.

At the end of 1996, after state and city officials could not agree on terms for additional site investigation and cleanup, FDEP requested that EPA take back the enforcement lead. EPA called for a review of the existing lead exposure data, requesting that the federal **Agency for Toxic Substances and Disease Registry (ATSDR)** perform a **health consultation**. ATSDR's February 1997 health consultation concluded that, although portions of the site are a public health hazard based on lead levels in the soil, the children tested in 1996 at the school and in the surrounding neighborhoods did not appear to have been recently exposed to high levels of lead contamination. ATSDR recommended restricting access to the most contaminated soils, further sampling, and delineating the extent of lead contaminated soil and ash.

EPA took more environmental samples in 1997 and had them analyzed for a wide range of contaminants, including metals, pesticides, PCBs, dioxins, and other organic and inorganic compounds. EPA's March 1998 **expanded site investigation (ESI)** report presented the results and concluded that surface soil, sediment, surface water, and groundwater have been affected by contaminants originating at Brown's Dump. Although several types of contaminants were detected both in soil and water samples, the highest concentrations exceeding EPA criteria were for lead found in the soil. Based on the ESI results, EPA determined that the primary concern to human health is soil exposure for Mary McLeod Bethune students and neighborhood residents.

EPA requested that ATSDR conduct a public health assessment for the Brown's Dump site using the latest 1997 ESI results. A draft version of this public health assessment was released for public comment during the summer of 1999 and a final health assessment has not yet been released. ATSDR's recommendations in the draft were similar to those in 1997 health consultation: maintain access restrictions to the fenced area at Bethune elementary, and sample further to determine extent of contamination in the residential areas, Moncrief Creek, and groundwater.

EPA called for action on the Brown's Dump site under the Superfund program, although the site is not currently on the NPL. In May 1999, EPA sent special notice letters to the City of Jacksonville, Duval County School Board, and JEA identifying them as **potentially responsible parties (PRPs)** for the Brown's Dump site. These PRPs were asked to voluntarily undertake a remedial investigation and feasibility study for the site. On September 1, 1999, the City of Jacksonville, Duval County School Board, and JEA signed a legal agreement with EPA, called an **administrative order by consent**, to perform the required studies.

2.4 Planned Superfund Activities

The administrative order set in motion the steps of the Superfund process for Brown's dump. The City of Jacksonville is the lead PRP and is responsible for performing a detailed analysis of the site, called a **remedial investigation (RI)**. The general purpose of the RI is to determine the nature and extent of contamination. Based on existing and new data from the site, the RI identifies the types and concentrations of contaminants present at the site, and describes how far and how deep the contamination extends in the soil, groundwater, or surface water.

When the RI is complete, EPA will use the data to conduct a **risk assessment** to evaluate risks to human health and the environment that are present at the site. A risk assessment is used to set goals for reducing potential long-term exposures from the site, but does not address possible effects from past site exposures.

The RI and risk assessment provide the basis for a **feasibility study (FS)** to evaluate options for cleaning up the site. EPA will evaluate the cleanup alternatives using criteria established under the Superfund process and will issue a **proposed plan** for site cleanup. On average, it takes 18 months to complete a Superfund RI/FS.

After taking public comments on the proposed plan into consideration, EPA will announce a final **cleanup remedy** in a **record of decision**. EPA will then request that the PRPs enter into a new Administrative Order by Consent to clean up the Brown's Dump site.

During the site investigation and cleanup process, EPA will keep the community informed of progress and will provide opportunities for input as described in this Community Involvement Plan. In addition, the City established a **Technical Assistance Plan** through which a \$50,000 grant has been awarded to a qualified non-profit community group. The selected group will use the grant funding to obtain the services of a technical advisor to assist the community in reviewing and understanding the site study information.

3.0 Community Profile

3.1 Local Government Structure

The City of Jacksonville was consolidated with Duval County in 1968 after voters approved a plan to eliminate duplication of services and provide a unified tax base. Jacksonville's 840 square-mile land area makes it one of the largest cities in the United States. Population of the greater Jacksonville area is more than one million and is increasing with continued economic and residential development in northeast Florida. Duval County is bordered by Nassau County on the north, which forms Florida's northeast border with the State of Georgia.

The combined municipality is administered by a strong Mayor/Council form of government. The Mayor and Council members are elected to 4-year terms, with a 2-term limit. The 19-member City Council represents 14 districts of approximately equal population, with five additional at-large seats. The Council enacts city laws (ordinances), levies taxes and issues bonds, and authorizes the budgets of the ten central government departments. The Mayor is the chief administrative officer of the consolidated government, and appoints department and division directors subject to confirmation by City Council.

Independent agencies include the Jacksonville Electric Authority, Jacksonville Housing Authority, port authority, family and childrens' services, freeways and mass transportation, and economic development. Duval County comprises a single school district, governed by a seven-member elected School Board. The Duval County Public Health Department is a part of the State of Florida's system of county public health departments. The Public Health Unit director is appointed jointly by the Mayor and the Florida Department of Health.

3.2 Community Characteristics

The Brown's Dump site is situated in a well-established area of northwest Jacksonville, approximately one mile west of I-95, two miles north of I-10, and three miles northwest of the central business district. Land use surrounding the site is primarily residential, comprised of high density single- and multi-family homes. Mixed commercial and industrial land uses are scattered along Moncrief Road three blocks to the east and Highway 1 (20th Street Connector) a few blocks south of the site.

Moncrief Creek flows northeast along a portion of the site and drains into the Trout River approximately three miles from the site. The Trout is a tributary of the St. Johns River, a major

waterway that flows north through Duval County and Jacksonville and empties into the Atlantic Ocean 15 miles to the east.

The neighborhoods near the site mostly were developed 40 to 60 years ago. Much of the housing stock is comprised of modest single-family houses on small lots, mingled with occasional low-rise apartment buildings. According to individuals knowledgeable about area history, residents of the northwest portion of Jacksonville that includes the site were historically African-American, as is the case today. The area was originally settled by upwardly mobile families, many of whom have relocated. A greater than average proportion of the population is comprised of elderly residents who remain in the homes they purchased years ago.

Many homes in these areas are no longer owner-occupied, and the population has become more transitory. Some houses and apartments have been allowed to fall into disrepair. The aging and decline of some neighborhoods in northwest Jacksonville has brought an influx of crime and drug problems.

In recent years, longtime residents have emerged as community leaders and are working to reduce crime, clean up, improve, and restore pride in their neighborhoods. Various government programs are providing funding and services supporting these efforts. Affordable housing is provided through the Jacksonville Housing Authority, and in the area north of Moncrief Creek, several new homes recently were completed through the HabiJax program, a local affiliate of Habitat for Humanity.

In the Brown's Dump area, the Royal Terrace Community Association is involved in community safety and improvement issues. Grand Park, the neighborhood immediately south of Royal Terrace, has an active Community Association that has successfully worked with the City on surface drainage improvements. Their leaders are also taking an active interest in site issues.

Both neighborhood groups are part of the Northwest Citizens Planning Advisory Committee (NW CPAC), one of six CPAC districts established by the City in 1993 to encourage community involvement in municipal and neighborhood improvement issues. The six CPAC districts now encompass approximately 300 neighborhood associations. In 1997, the Mayor created the City's Neighborhoods Department, which includes staff who serve as liaisons with CPAC districts.

Northwest Jacksonville has numerous churches of various denominations and sizes. Beyond providing a spiritual foundation, churches in the African-American community are an integral part of the community and social structure. Pastors of many churches are actively involved in issues of concern to their congregations and also participate in ministerial alliances. In Jacksonville, the

Interdenominational Ministerial Alliance, the Baptist Ministers Conference, the African Methodist Episcopal ministers, and ICARE are alliances whose members meet regularly and sponsor programs to address a range of community-based needs. These groups are also taking an interest in ash site issues.

4.0 History and Analysis of Community Concerns

The following subsections provide a summary of public awareness and involvement in issues regarding the site, and an overview of key community concerns identified through interviews conducted by EPA in November and December 1999. The summary information provided in this section may not represent all aspects of the site community or viewpoints of community members who were not interviewed.

4.1 Chronology of Community Involvement

General public knowledge of the site was fairly limited until May 1999. Long-term residents who lived in the area when Brown's Dump was operating were aware that Mary McLeod Bethune Elementary School now occupies a portion of the former dump location. When agency involvement in site investigations was initiated in the mid-1980s, city officials, school board members and administrators were informed of activities at the site. However, most community members did not know of the connection between the former dump and the elementary school until Spring 1999.

In May 1999, after EPA notified the City of Jacksonville, JEA, and the Duval County School Board of their status as PRPs, Jacksonville Mayor John Delaney held a "town hall" meeting at Mary McLeod Bethune Elementary School. Officials gave an overview of the site history and pledged to take necessary steps to address the issue and protect school children and residents. Two days later, the Florida Department of Environmental Protection held a followup meeting at the school.

The meetings were covered by the Jacksonville *Times-Union*, the first of numerous news articles on Brown's Dump and three other so-called "ash sites" targeted by EPA for action under Superfund. Intense media coverage throughout the summer and early fall of 1999 was a major factor in raising public awareness throughout the city. Most of the articles referred both to Brown's Dump and the other three locations, which EPA grouped together as the Jacksonville Ash site.

Soon after the media coverage started, parents and PTA representatives began raising concerns about possible health effects for students attending Bethune Elementary and for nearby residents. In July, city, school, and county health officials held the first of several community meetings to answer questions about the site and its effects on the school. Some concerned individuals formed a group, Citizens Organized for Environmental Justice (COEJ), whose members called for the school to be closed. COEJ has also called for residents in affected areas to be relocated. Local officials have met on several occasions with group members to discuss their concerns.

During the summer, the School Board voted to keep the school open and give parents the option of transferring their children from Bethune to other schools that had space available for additional students. COEJ opposed the Board's decision and mounted a campaign to persuade parents to take their children out of the school and effectively close it down. Others, including members of the NAACP and Baptist Ministers Conference, have called for closing the school. Since the school session started in the fall, activists have been observed frequently picketing in front of the school.

Mayor Delaney announced in August a nine-step action plan to address ash site issues. The steps include blood tests for children, soil testing, and well water testing upon request of residents living in the four site areas. Play areas at the school and at parks located at the other three ash sites were covered with sod, sand, lime, and/or mulch. The city is also testing water and fish from Moncrief Creek and McCoy's Creek near one of the other ash sites. The city offered to provide free ground cover to residents' yards that tested positive for lead, and the Mayor's office set up a local hotline to answer questions (904-630-ASH7).

Local officials held six informational sessions at Bethune Elementary in September and October to provide an opportunity for community members to meet with and ask questions of health specialists and school district officials. Initially, attendance at these sessions was high, but decreased over time.

U.S. Congresswoman Corrine Brown held a meeting at her Jacksonville office, inviting members of COEJ, local, state, and EPA officials, and other interested parties to discuss the ash site issues. Congresswoman Brown also sponsored a six-hour Incinerator Ash Information Exchange open house on Saturday, November 13, 1999, at Edward Waters College.

Other organizations involved in site-related activities include the ministerial alliances mentioned previously. During the fall of 1999, the Mayor attended a meeting of the Baptist Ministers Conference and city representatives met with ministers at an ICARE Pastors Caucus.

With public awareness heightened by coverage of the ash site issues, information about other dump sites in Jacksonville came to light. As a result, the Mayor asked his staff to compile an inventory of reported dump locations, now numbered at more than 300 throughout the city. The Mayor has publicly committed city resources to identify and address issues related to the ash sites and any other sites that may pose a threat to the community. City staff hold periodic "dumps meetings" with community activists to provide updates on dump site issues and allow for input.

The Mayor established a Citizens' Health Advisory Committee to gather information and monitor activities and issues related to the ash sites and the additional dump sites. Those invited to participate

include representatives of the CPACs mentioned previously, the NAACP, ministerial groups, environmental organizations, educational institutions, and other groups that have a direct interest in site issues. The committee is facilitated by representatives of the Duval County Health Department. Members meet biweekly to review and discuss developments on the dump sites and serve as liaisons with their groups and the community as a whole.

EPA participated in several of the public forums and group meetings held by others in 1999 to discuss ash site issues. EPA Region 4 also developed a Superfund Update fact sheet on Brown's Dump (October 1999) to provide background information on the site.

4.2 Key Community Issues and Concerns

EPA heard six major areas of concern during the community interviews:

- Low trust in public agencies dealing with site issues.
- Health effects in children and residents.
- Economic and community effects.
- Environmental justice concerns.
- Cleanup standards.
- Communication issues.

4.2.1 Low Trust in Public Agencies

Some interview participants voiced a low level, or in some cases, a complete lack of trust in agencies involved in the Brown's Dump site. Local agencies suffer from the greatest distrust due to perceptions of past actions related to the site. The City of Jacksonville apparently has the least credibility among those who hold this view, with the Duval County Health Department and School Board close behind. Although the low trust issue appears to have existed to some extent in past years, it has become more pervasive with publicity about the history of the ash sites.

Individuals holding this view believe that city officials have known about site problems for years, but have neglected to address them. One person said that enough studies have been done, and the agencies should know what actions need to be taken. Even though the city has accepted responsibility for carrying out the site investigation, distrustful community members are extremely skeptical about whether the investigation will be adequate and whether they will be able to trust the results.

Some persons interviewed feel the community has already been denied input to decisions about the RI/FS process. Some believe an opportunity to comment on the proposed Administrative Order should have been provided, and that the Mayor and City Council voted to sign the Order at a special

session after telling community members the vote would be taken at a later date. A few individuals also mentioned dissatisfaction with the City's handling of the Technical Assistance Plan solicitation.

Some interviewees also expressed low trust in the Duval County Health Department, saying they have little faith in reassurances that children attending Bethune Elementary are not at risk. They cited conflicting information from other sources, and they cannot understand how officials can acknowledge the presence of contaminants and yet state that exposure risks do not warrant closing the school. People who advocate closing Bethune also feel that the Duval County School Board should have taken action much sooner, because the Board had information years ago about the dump underlying the school.

A few individuals expressed low trust in the state agency, FDEP, due to an apparent lack of action on the ash sites during the time the agency had the lead responsibility. Levels of trust in EPA range from somewhat low to moderately high. Some question why it has taken EPA since 1985 to get to this stage in the process. Others are pleased that the federal agency is taking charge, and they are optimistic that the site will be cleaned up appropriately. Many people are withholding judgment until they see how the work is progressing and have an opportunity to review the results.

4.2.2 Health Effects

Many of the persons interviewed expressed concern about past or future health effects that could be related to the site. The level of concern seems to vary from low to extremely high. Some simply wonder whether there might be long-term health effects for people who have lived near the site for several years or for children who attended Mary McLeod Bethune school for six years. Others hold the conviction that serious medical conditions or even deaths can be attributed to the site. They question why the health agencies say there is no immediate risk, while acknowledging the presence of toxic contaminants at concentrations above federal and state standards.

Some residents who were born and raised in the Brown's Dump area said they and their children are perfectly healthy and do not think the site is the reason for health problems in the community. Others with documented illnesses believe that exposure to site contaminants is at least a factor, if not the primary cause, of their problems. Residents whose yards have detectable lead levels are fearful that their children may have been exposed before the additional sod or mulch was provided. Some long-term residents who raised garden vegetables in the past wonder if eating them was harmful.

Several people voiced concern about potential health risks for the children attending the school. They believe that governmental agencies should take an extremely cautious approach to the issue. Some feel that, if any possibility of exposure exists, the school should be closed until the extent of the problem

is identified, and the site can be cleaned up. Others have faith in health officials' view that available information does not indicate the school children are at risk. Those who believe that closing the school is not warranted want reassurance that the authorities will take immediate action if new information indicates unacceptable risks.

4.2.3 Economic and Community Effects

Some interviewed believe that the existence of a Superfund site in the neighborhood has devalued their properties so that they cannot sell or even use the property as loan collateral. They feel houses located on a dump site are worthless. These individuals want to be relocated and compensated for their properties.

School officials stated Bethune Elementary has lost funding for improvements and student programs because of the site. About six years ago, \$4 million was allocated for renovating the school. When concerns were raised about disturbing the lead-contaminated soil, the money was held back. In the 1999-2000 school year, Bethune lost \$840,000 of student-based funding for various programs when one-fourth to one-third of the students transferred to other schools.

School officials perceive that the negative publicity hurt the school's efforts to improve its educational status. In Florida, schools are graded according to student performance on state tests. Bethune is one of five schools in Duval County in the "F" category. If scores do not improve, the school may fall under the state voucher program that provides funding for parents who elect to send their children to private schools.

One person estimated that, if polled, perhaps 30 percent of residents might advocate closing the school. Another view is that the "silent majority" of residents do not want it closed, and that a small group of individuals do not speak for the entire community. Some community members expressed the opinion that closing the school would harm the community. They feel that maintaining a neighborhood school is important in maintaining cohesiveness and a sense of community. Some also worry about the negative impact of bussing children long distances to schools outside their neighborhood.

4.2.4 Environmental Justice

Some interviewees observed that the predominantly African-American north and northwest areas of Jacksonville also have a disproportionate number of dump sites and industrial facilities. They voiced the suspicion that the City and other entities intentionally located or encouraged such facilities to locate in low income or minority areas.

Some individuals believe that the delay in action on the site can be attributed to discrimination against people of color or economically disadvantaged populations. They feel that ash dump sites would not have been placed in more prosperous or majority-white areas to start with, and that if a contaminated site is found in such an area, it would receive prompt attention. Persons expressing this view feel both victimized and disenfranchised with respect to decisions about the sites.

Others in the interviews noted a divergence of opinions within the African-American community. Some leaders say the community has been exploited and misled for years, and as a result people do not trust the process or believe that the wrongs will be made right. Others say the Mayor is accepting responsibility and reaching out to the black community; therefore, people should support the efforts and give the process a chance to work.

4.2.5 Cleanup Standards

Several of those interviewed asked about the cleanup standards that will be applied at the site. Cleanup standards are numerical levels or goals set for reducing contaminants at a site, based on concentrations that governmental agencies consider protective of human health and the environment.

Recognizing that EPA and FDEP have different standards for certain substances present at the site, some individuals and groups want to see the more stringent state standards applied in cleaning up Brown's Dump. They intend to lobby for a decision to use FDEP's lower cleanup standard for dioxin, for example.

Groups active in the ash site issues have requested that EPA seek community input early in the RI/FS process on the approach and factors to be used in the health risk assessment. They want to see the community involvement program follow the guidelines provided in *Risk Assessment Guidance for Superfund: Volume 1, Community Involvement in Superfund Risk Assessments*, (U.S. EPA, March 1999).

4.2.6 Communication Issues

The interviews yielded a number of observations and suggestions about site-related communications. Most people seem to agree that a review of 1999 communication activities related to the ash sites reveals several concerns:

- People are confused about the site study process and agency roles.
- Despite the frequency and amount of information, high potential exists for misinformation.
- Multiple and occasionally conflicting sources of information lead to confusion.
- Many parties are talking; not everyone is listening.

- Agency communications are sometimes seen as inconsistent or not forthcoming.
- Many 1999 meetings on ash site issues were adversarial and nonproductive.

Suggestions in the interviews focused on various means to increase the clarity, credibility, and delivery of information. They also emphasized the need to get information out to the people who are most affected, i.e., those who live, work, or play at or near the site.

One person emphasized the need for EPA to provide information and opportunities for input separate from PRP communication activities. Another recommendation is to explain to the community at large the status of the process: what is known and what is not known, what has been done and what remains to be done, who is responsible and what are the different agency roles, and what is the time line for the steps in the process.

5.0 Community Involvement Program

This section establishes goals and objectives for EPA's community involvement program. It describes activities EPA will use to inform and involve the public during the RI/FS at the Brown's Dump site. EPA intends this plan to be flexible and will modify program aspects as needed to respond to community needs.

5.1 Goals

This community involvement program is designed to keep the public informed of site progress, establish two-way communication, and provide opportunities for public input. A primary goal is to involve the community in site cleanup decisions as required under Superfund.

5.2 Objectives

The community involvement program has the following objectives:

- Provide accurate site information to community members and interested groups on a timely basis and in nontechnical language.
- Encourage and publicize opportunities for community input during the process.
- Provide methods and means for interested citizens to participate in decisions about risk reduction and site cleanup.
- Notify local officials, residents, and businesses in the site area before field work or other site actions take place.
- Clarify the roles and responsibilities of the PRPs, EPA and other agencies involved in the RI/FS.
- Seek to increase the level of awareness and understanding of the Superfund process and the specific activities involved in the RI/FS.
- Listen and respond to community concerns about the Brown's Dump site, health issues, and the site investigation.

5.3 Key Messages

EPA will follow the seven cardinal rules of risk communication presented in Appendix E to achieve the goals and objectives of this community involvement program. Through the activities outlined in this plan, EPA will communicate the following messages:

- EPA is responsible for ensuring that the RI/FS is conducted according to federal requirements and meets EPA technical criteria.
- The public has a meaningful role in the process and community concerns will be taken into account in decisions on risk reduction and site cleanup.
- EPA will select the cleanup remedy that provides the best balance of environmental and human health protection while serving community needs.

5.4 Target Audiences

The community involvement program has five target audiences:

- Residents living on or near the site.
- Parents or guardians of children attending Mary McLeod Bethune Elementary School.
- Other groups, including neighborhood and civic associations, ministerial alliances, and environmental groups, who express interest in the site.
- Local, state, and federal elected and appointed officials who serve the area community.
- Area news media.

Appendix A - List of Contacts includes some target audience members (officials, neighborhood and environmental groups, news media), and EPA is developing a mailing list to include the broader audience groups (residents, parents).

5.5 Community Involvement Activities

The activities outlined in this plan are designed to fulfill community involvement requirements under Superfund, address specific community concerns described in Section 4, and provide a variety of opportunities for interested individuals to participate in the site study and cleanup process. During the interviews, EPA asked community members to identify the most effective methods to provide information, allow for input, and reach the largest number of persons in the target audiences.

Interview participants requested that EPA provide information directly to the community. They want information to be presented in "plain English" and in formats that people in the community will understand. They suggested that EPA communicate through channels that are trusted, familiar, and

convenient, such as churches, neighborhood associations, and groups representing the community. Information distributed through the media should include the African-American press (included in Appendix A).

5.5.1 EPA Contacts

EPA's Remedial Project Manager is the primary point of contact for all site-related inquiries and will be responsible for implementing the community involvement activities in this plan. EPA's Environmental Justice Program Manager for the Region 4 Waste Division (including Superfund) will also be involved in site activities. They can be contacted as follows:

Randa Chichakli

Remedial Project Manager

U.S. EPA Region 4

61 Forsyth Street, SW

Atlanta, GA 30303

Telephone: (404) 562-8928

Toll free: 1-800-435-9234

E-mail: chichakli.randa@epa.gov

Eddie Wright

Environmental Justice Program Manager

U.S. EPA Region 4

61 Forsyth Street, SW

Atlanta, GA 30303

Telephone: (404) 562-8669

Toll free: 1-800-435-9234

E-mail: wright.eddie@epa.gov

Angela Leach

Public Affairs Specialist

U.S. EPA Region 4

61 Forsyth Street, SW

Atlanta, GA 30303

Telephone: (404) 562-8561

Toll free: 1-800-435-9234

E-mail: leach.angela@epa.gov

5.5.2 Prepare and Maintain Site Mailing List

EPA began compiling a site mailing list in 1999 and is incorporating additional lists from groups involved in community interviews. The site mailing list includes individuals who have expressed interest in the Brown's Dump site; previous meeting attendees; residents living near the site; interested groups; news media; and local, state, and federal officials representing the site community. The key contacts in Appendix A will be included in the site mailing list. The list will be used to distribute site information sheets and EPA meeting notices.

5.5.3 Distribute Fact Sheets / Site Updates

EPA prepared an initial site fact sheet in October 1999. Additional fact sheets or site updates will be prepared at key stages of the site investigation and cleanup. The fact sheets will be written in clear, nontechnical language and will explain the Superfund process, describe work to be done during the site investigation, summarize findings, present the proposed plan, give periodic updates on site progress, and announce opportunities for public involvement. Each issue will include EPA contact information, location of the site information repository, and a schedule of upcoming site activities. Fact sheets will be distributed to the site mailing list, information repository, and at community meetings.

5.5.4 Hold Public Meetings / Availability Sessions

EPA will hold meetings at key stages in the process and as required by Superfund. A public meeting will be held in Spring 2000 to explain the Superfund process and discuss plans for the RI investigation. Additional meetings or **availability sessions** (open house format) will be scheduled during the RI/FS, as needed to address community concerns and provide opportunities for input. EPA will hold a required public meeting to summarize the cleanup options identified in the FS and present the proposed plan for public comment. EPA will also participate in public forums arranged by others, such as the February 2000 ash site availability session planned by Congresswoman Corrine Brown and other group meetings upon request and as schedules permit.

5.5.5 Coordinate with Technical Assistance Plan Recipient and Advisor

The City of Jacksonville selected Citizens Organized for Environmental Justice (COEJ) as the recipient of a \$50,000 Technical Assistance Plan (TAP) grant in January 2000. COEJ will in turn announce the selection of a technical advisor, who will assist the community in participating in the Superfund process and understanding and preparing comments on RI/FS documents. EPA will coordinate with COEJ and its technical advisor to the greatest possible extent, providing information directly to COEJ, as requested.

5.5.6 Hold Comment Period and Respond to Comments

At the completion of the feasibility study, EPA will announce a **public comment period** for a minimum of 30 days as required under Superfund to allow interested groups and individuals time to review and comment on the cleanup options and EPA's proposed plan for long-term site cleanup. It is expected that the comment period and the proposed plan public meeting will take place sometime in mid-2001. EPA will review and consider all comments received on the proposed plan and will prepare a **responsiveness summary**, addressing commenters' issues and concerns. The responsiveness summary will document EPA responses to public and agency comments.

5.5.7 Provide Timely and Accurate Information to the News Media

EPA will issue press releases and public service announcements to the local news media identified in Appendix A at key stages of the RI/FS. The releases will be timed to announce upcoming events and other milestones in the process.

As required under Superfund, EPA will place a public notice in the form of a paid display advertisement in the most widely read local newspaper(s) when the proposed plan is released to the community. The advertisement will provide a brief summary of cleanup options considered for the site; the date, time, and place of the public meeting; dates for the public comment period; and sources to contact for additional information.

5.5.8 Maintain an Information Repository

EPA has established an information repository for Brown's Dump site documents at the Clanzel T. Brown Community Center, 4545 Moncrief Road, located a few blocks from the site. Appendix B provides the address, telephone number, and hours of operation for the center. The repository will include site work plans, final reports, fact sheets and site updates, the Community Involvement Plan, meeting transcripts, and general Superfund information. The information is available to the public for review and may be copied as desired. EPA will update the repository as new documents become available.

EPA has also established an administrative record file for the site at the Clanzel T. Brown Community Center and at the EPA Region 4 office in Atlanta (Appendix B). This file includes all information used by EPA to make its decision on site cleanup. EPA published a notice of availability of the administrative record file in a local newspaper.

5.5.9 Other Sources of Information

Brown's Dump site fact sheets are available online at <http://www.epa.gov/region4/waste/sf/remedial/factsht/factsht.htm>. EPA maintains an internet web site with general information on EPA programs at www.epa.gov. In addition, EPA's Office of Solid Waste and Emergency Response maintains a web site with information about CERCLA/Superfund and related programs at www.epa.gov/oswer/. Internet access to EPA's hotline for answers to questions on Superfund and other waste programs is available at: www.epa.gov/epaoswer/hotline/. Site-specific questions should be directed to the EPA remedial project manager for the site. Section 5.5.1 of this document presents contact information for the remedial project manager, including an email address.

The City of Jacksonville maintains a web site at www.coj.net on which the Mayor's staff plan to include ash site information, such as the award of the Technical Assistance Plan grant.

5.6 Evaluation and Revision of Community Involvement Program

EPA has prepared this plan to address community issues and information needs identified during community interviews in December 1999. EPA will track public viewpoints and ask for feedback on the usefulness of the community involvement activities conducted for this program. If concerns change or new needs and innovative approaches develop during the course of the RI/FS and cleanup, this community involvement program can be modified to enhance its effectiveness.

5.7 Implementation Schedule

Community involvement activities for the Brown's Dump site will follow the Superfund requirements, with supplemental activities at appropriate milestones to address community requests for information and involvement. Table 1 presents the suggested timing for community involvement activities.

Table 1 Implementation Schedule	
Technical Milestone	Community Involvement Activities
Start of RI/FS	<ul style="list-style-type: none">• Establish and maintain information repository and administrative record file.• Conduct community interviews and develop community involvement plan.• Designate EPA contact person(s).• Develop expanded mailing list.• Prepare fact sheet on plans for RI; distribute to mailing list and repository.• Hold public meeting or availability session to explain Superfund process and RI work plan.• Contact local media representatives and issue notices of meetings.• Offer presentations on site activities to community residents and interested groups.
During RI/FS	<ul style="list-style-type: none">• Maintain telephone contact with officials and groups involved in process; respond to inquiries.• Issue news releases and site updates as needed to keep media and public informed of progress.• Hold meetings or availability sessions as needed to address questions about site activities.
Completion of RI and Risk Assessment	<ul style="list-style-type: none">• Distribute a fact sheet summarizing RI findings and risk assessment results.• Update the repository with the RI and risk assessment reports and other relevant information.• Hold a public meeting or availability session.

Table 1
Implementation Schedule

Technical Milestone	Community Involvement Activities
Completion of FS	<ul style="list-style-type: none"> • Publish a notice of availability of the RI/FS and a summary of cleanup alternatives and the proposed plan in major local newspaper. • Announce and hold a minimum 30-day public comment period. • Hold a public meeting to accept comments on the proposed plan. • Prepare a transcript of the public meeting. • Update repository with full RI/FS and proposed plan documents before the start of public comment period and at least 2 weeks before the public meeting. • Distribute a fact sheet on the cleanup alternatives and proposed plan to the mailing list. • Issue a news release on activities.
Record of Decision (ROD)	<ul style="list-style-type: none"> • Prepare a Responsiveness Summary. • Publish a notice announcing EPA's selection of cleanup remedy and signing of the ROD. • Update administrative record with all documents used in cleanup decision, the ROD and Responsiveness Summary. • Distribute a news release and/or site update. • Hold meeting or conduct briefings for local groups.
Remedial Design and Action (Cleanup)	<ul style="list-style-type: none"> • Revise community involvement plan. • Distribute a news release and/or site update. • Hold meeting or conduct briefings for local groups. • Hold meetings or availability sessions to discuss site cleanup plans and activities. • Distribute fact sheets explaining cleanup details. • Issue news releases on site cleanup milestones.

Table 1
Implementation Schedule

Technical Milestone	Community Involvement Activities
Completion of FS	<ul style="list-style-type: none"> • Publish a notice of availability of the RI/FS and a summary of cleanup alternatives and the proposed plan in major local newspaper. • Announce and hold a minimum 30-day public comment period. • Hold a public meeting to accept comments on the proposed plan. • Prepare a transcript of the public meeting. • Update repository with full RI/FS and proposed plan documents before the start of public comment period and at least 2 weeks before the public meeting. • Distribute a fact sheet on the cleanup alternatives and proposed plan to the mailing list. • Issue a news release on activities.
Record of Decision (ROD)	<ul style="list-style-type: none"> • Prepare a Responsiveness Summary. • Publish a notice announcing EPA's selection of cleanup remedy and signing of the ROD. • Update administrative record with all documents used in cleanup decision, the ROD and Responsiveness Summary. • Distribute a news release and/or site update. • Hold meeting or conduct briefings for local groups.
Remedial Design and Action (Cleanup)	<ul style="list-style-type: none"> • Revise community involvement plan. • Distribute a news release and/or site update. • Hold meeting or conduct briefings for local groups. • Hold meetings or availability sessions to discuss site cleanup plans and activities. • Distribute fact sheets explaining cleanup details. • Issue news releases on site cleanup milestones.

6.0 References

1. Community Interviews for Brown's Dump site in Jacksonville, Florida, U. S. Environmental Protection Agency, Region 4, Atlanta, Georgia. November - December 1999.
2. *Superfund Update Fact Sheet for Brown's Dump Superfund Site*, U. S. Environmental Protection Agency, Region 4, Atlanta, Georgia. October 1999.
3. Black History Month: Mary McLeod Bethune, <http://www.kron.com>
4. Most Important Floridians of the 20th Century, <http://www.theledger.com/top50>
5. *Risk Assessment Guidance for Superfund: Volume 1 - Human Health Evaluation Manual, Supplement to Part A: Community Involvement in Superfund Risk Assessments*. U. S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, March 1999. EPA 540-R-98-042.
6. *Superfund Community Involvement Handbook and Toolkit*. U. S. Environmental Protection Agency, Office of Solid Waste and Emergency Response, Washington, D. C. 1998. EPA 540-R-98-007.

Appendix A

Key Contacts

A. Federal Elected Officials

U.S. Senator Bob GrahamWashington Office

524 Hart Senate Office Building
Washington, D.C. 20510-0904

Phone: 202-224-3041

District Office

325 John Knox Road
Tallahassee, FL 32303

Phone: 850-422-6100

U.S. Senator Connie MackWashington Office

517 Hart Senate Office Building
Washington, D.C. 20510-0904

Phone: 202-224-5274

District Office

1342 Colonial Boulevard, Suite 27
Ft. Myers, FL 33907

Phone: 941-275-6252

U.S. Congresswoman Corrine BrownWashington Office

2444 Rayburn House Office Building
Washington, D.C. 20515

Aide: Tom McDaniels

Phone: 202-225-0123

District Office

101 East Union St., Suite 202
Jacksonville, FL 32202

Aide: Vicki Lynch

Phone: 904-354-1652

B. State Elected Officials

Governor Jeb Bush

Executive Office of the Governor
Capitol Building, PL-05
Tallahassee, FL 32399-0001

Phone: 850-488-4441

Senator Betty Holzendorf

816 North Ocean Street
Jacksonville, FL 32202

Phone: 904-359-6880

Florida Dept. of Environmental Protection

Mary Nogas
7825 Bay Meadows Way, Suite B-200
Jacksonville, FL 32256-7590

Phone: 904-448-4320

Florida Department of Health

Randy Merchant, Environmental Toxicology
2020 Capitol Circle SE, Bin C22
Tallahassee, FL 32399-1742

Phone: 850-488-3385

Duval County Health Department

Director, Duval County Health Unit: Dr. Jeffrey Goldhagen
515 West 6th Street
Jacksonville, FL 32211

Phone: 904-630-3220

Duval County Health Department

Director, Environmental Health: Dr. Aaron Hilliard
900 University Blvd. N., Suite 410
Jacksonville, FL 32211

Phone: 904-630-3251

Duval County Public Schools

Superintendent: John C. Fryer, Jr.
1710 Prudential Drive
Jacksonville, FL 32207

Phone: 904-390-2115

Duval County Public Schools

Director, Environmental and Facility Services: Bruce Ackerman
1710 Prudential Drive
Jacksonville, FL 32207

Phone: 904-390-2220

E. Local Organizations**AME Ministerial Alliance**

President: Reverend Mark L. Griffin
Wayman Chapel AME Church
8855 Sanchez Road
Jacksonville, FL 32217

Phone: 904-739-7500

Baptist Ministers Conference

President: Reverend James B. Sampson
First New Zion Missionary Baptist Church
4835 Soutel Drive
Jacksonville, FL 32208

Phone: 904-765-3111

Mary McLeod Bethune Elementary School

Principal: Debra Williams
4300 Pearce Street
Jacksonville, FL 32209

Phone: 904-924-3044

NAACP

Jacksonville Chapter President: Isaiah Rumlin
P.O. Box 12263
Jacksonville, FL 32209

Phone: 904-764-1753

North Riverside Community Association

(TAP grant recipient for Jacksonville Ash Site)
President: Diane Kerr
2983 Edison Avenue
Jacksonville, FL 32254

Phone: 904-387-4641

Northeast Florida Community Action Agency, Inc.

Executive Director: John W. Edwards, Jr.
411 West Adams St., Suite 200
Jacksonville, FL 32202

Phone: 904-358-7474

Northwest Citizens Planning Advisory Committee

Chairperson: Brad Straley
7882 Knoll Drive N.
Jacksonville, FL 32221

Phone: 904-695-2485

Royal Terrace Community Association

President: Rosa Stephens
2131 Brooklyn Road
Jacksonville, FL 32209

Phone: 904-764-0055

Sierra Club

NE Florida Chapter Contact: Jimmy Orth
4984 Harp Street
Jacksonville, FL 32258-2220

Phone: 904-730-9917

F. News Media**Newspapers****Florida Times-Union**

Steve Patterson
One Riverside Ave./ P.O. Box 1949
Jacksonville, FL 32231

Phone: 904-359-4263
Fax: 904-359-4478

WJXT - Channel 4
Tracy Gaffney
1851 Southampton Road
Jacksonville, FL 32247

Phone: 904-399-4000
Fax: 904-399-1828

WJXX - Channel 25
Leigh Hutchins
7025 A C Skinner Parkway
Jacksonville, FL 32256

Phone: 904-332-2525
Fax: 904-332-2418

WTLV - Channel 12
Elizabeth Clien
1070 E. Adams Street
Jacksonville, FL 32202

Phone: 904-354-1212
Fax: 904-354-3299

Radio

WCGL Victory Radio
6050-6 Moncrief Rd.
Jacksonville, FL 32208

Phone: 904-766-9955
Fax: 904-765-9214

WSOL 101.5 FM
10592 E. Balmoral Circle, Suite 1
Jacksonville, FL 32218

Phone: 904-696-1015
Fax: 904-696-1011

WJBT 92.7
10592 E. Balmoral Circle, Suite 1
Jacksonville, FL 32218

Phone: 904-696-1015
Fax: 904-696-1011

WSVE (Gospel)
4343 Spring Grove St.
Jacksonville, FL 32209

Phone: 904-768-1211
Fax: 904-768-5115

WXQL 105.7
5913 Normandy Blvd. Suite 6
Jacksonville, FL 32205

Phone: 904-378-3094

Appendix B

Location of Information Repository and Administrative Record File

EPA has established an information repository for the Brown's Dump site at the following location:

Clanzel T. Brown Community Center

4545 Moncrief Road
Jacksonville, Florida 32205

(904) 765-5282

Hours of operation: Monday through Friday, 8:30 a.m. to 8:00 p.m.

The administrative record file is housed at the same location, and a copy of the record is also kept at the EPA Region 4 office:

U.S. Environmental Protection Agency

Region 4, South Superfund Branch
61 Forsyth Street, SW
Atlanta, Georgia 30303

Toll-free: 1-800-435-9234

Contact: Randa Chichakli, Remedial Project Manager

Appendix C

Locations for Public Meetings and Meeting Support Services

Locations for Public Meetings and Availability Sessions

1. **Clanzel T. Brown Community Center**
4545 Moncrief Road
Jacksonville, Florida 32205
(904) 765-5282
2. **Edward Waters College**
Community Resource Center
Kings Road
Jacksonville, Florida 32209

Meeting Support Services

Transcription (Court Reporter) Services

1. **AAA Reporters**
233 East Bay St. #705
Jacksonville, FL 32202
904-354-4789
2. **Accurate Reporting Service**
501 West Bay St. #150
Jacksonville, FL 32202
904-355-8416
3. **Alderman, Evelyn G.**
311 West Monroe St.
Jacksonville, FL 32202
904-358-1806
4. **Associated Stenotype Reporters**
233 East Bay St. #912
Jacksonville, FL 32202
904-356-0401
5. **Hogan & Associates**
233 East Bay St. #705
Jacksonville, FL 32202
904-353-5500

Audio Visual Services/ Rental

1. Advantage Video
9951 Atlantic Blvd. #101
Jacksonville, FL 32225
904-724-9006
2. Immediate Audio Visual Solutions
500 Park Street
Jacksonville, FL 32204
904-354-3700
3. K&W Audio Visual & Camera
1309 Edgewood Ave. W.
Jacksonville, FL 32208
904-768-7388
4. Motherland Productions
Ron Starlings
P.O. Box 20324
Jacksonville, FL 32225
904-356-3989

Appendix D

Description of Superfund Process

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), more commonly known as "Superfund," was passed in 1980 and amended by the Superfund Amendments and Reauthorization Act (SARA) in 1986. CERCLA authorizes EPA to investigate and respond to releases of hazardous substances that may endanger public health or the environment. CERCLA established a fund of \$8.5 billion to pay for the investigation and cleanup of sites when parties responsible for the problems are unable or unwilling to pay for the work. EPA may then, through legal action, recover the costs of the investigation and cleanup from the responsible parties to replenish the fund for other Superfund projects.

After a site is discovered, the EPA investigates it and scores it, using the Hazard Ranking System (HRS). This system addresses several factors:

- Possible health risks to the human population.
- Potential hazards created by the substances at the site.
- Potential for the substances at the site to contaminate air or drinking water supplies.
- Potential for the substances at the site to pollute or harm the environment.

If a site's HRS score is high enough, it is placed on the EPA's National Priorities List. Every site on the National Priorities List qualifies for the federal Superfund program. After a site is listed, the EPA undertakes a thorough investigation to identify parties who may be legally responsible for the contamination problems. The search for potentially responsible parties (PRPs) can and frequently does continue throughout the remedial investigation and feasibility study (RI/FS) for the site. Once identified, these PRPs are asked to participate in the cleanup. If they are able to do so, but still refuse, they may be faced with legal action.

EPA develops a work plan and conducts an RI to assess the nature and extent of contamination to characterize potential risks to the community and the environment. EPA then performs an FS to examine various alternatives to correct or control the contamination. When the FS is completed, EPA evaluates the alternatives identified and recommends the alternative considered best for the site. A public comment period follows to give community members the opportunity to submit their comments on the alternatives. After the public comment period, EPA considers the community's concerns and chooses a specific long-term action for the site. This action is presented in a record of decision, EPA's formal decision document that summarizes the decision-making process and the selected

cleanup remedy for a site. After the record of decision is signed, the design of the remedy is developed and implemented.

The time needed to complete each of these steps is different for every site. In general, an RI/FS takes one to two years. Design of corrective action takes about six months to one year. The actual corrective action typically takes one to two years to implement, although treatment of contaminated groundwater may take several years and groundwater monitoring may continue for up to 30 years.

EPA monitors the site during all remedial activities. If contamination becomes an imminent threat to public health or the environment at any time during the remedial process, EPA may conduct an emergency action to alleviate the problem. In addition, EPA keeps residents and officials informed about activities at the site and provides opportunities for citizens to participate in the decision-making process. EPA considers citizen input in its decision regarding site cleanup.

Appendix E

Seven Cardinal Rules of Risk Communication

The "seven cardinal rules of risk communication" were developed by Vince Covello and Frederick W. Allen and published in an EPA pamphlet in 1988 (U.S. Environmental Protection Agency, OPA-87-020, April 1988). The rules, which are appropriate for all Superfund site communications, follow:

1. Accept and involve the public as a legitimate partner.
2. Plan carefully and evaluate your efforts.
3. Listen to the public's specific concerns.
4. Be honest, frank, and open.
5. Coordinate and collaborate with other credible sources.
6. Meet the needs of the media.
7. Speak clearly and with compassion.

Appendix F

Glossary

Administrative Order by Consent

A legal agreement between EPA and potentially responsible parties (PRPs) whereby PRPs agree to conduct or pay the cost of a site investigation and/or cleanup. In contrast to a consent decree, an administrative order by consent does not need to be approved by a judge.

Administrative Record File

A file that is maintained for the public and contains information used to make a decision about a site under CERCLA. The file is available for public review, and a copy is usually placed in the same location as the site information repository. A duplicate file is held at a central location, such as the EPA Regional office.

Agency for Toxic Substances and Disease Registry (ATSDR)

Superfund created ATSDR within the federal Public Health Service to work with other government agencies to initiate and implement a variety of health-related responsibilities. ATSDR develops toxicological profiles, prepares site-specific health assessments, establishes formal registries of persons exposed to hazardous substances, develops and disseminates health education information, establishes and maintains literature inventories on hazardous substances, helps prepare health and safety programs for workers at Superfund sites and workers responding to emergency releases, and provides health-related support in public health emergencies.

Availability Session

An "open house" event hosted by EPA to meet informally with citizens about site activities.

Cleanup

Actions taken to deal with a release or threatened release of hazardous substances that could affect public health or the environment. Cleanup is often used broadly to describe various response actions or phases of remedial responses, such as the remedial investigation/feasibility study.

Cleanup Remedy

A prescribed technical approach to reducing the concentrations of contaminants at a site. EPA selects a cleanup remedy from alternatives identified in the feasibility study after applying a set of balancing criteria and considering public comments.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA)

CERCLA or Superfund was passed in 1980 and amended by the Superfund Amendments and Reauthorization Act (SARA) in 1986. The Act originally created a special tax that goes into a fund to investigate and clean up abandoned or uncontrolled hazardous waste sites.

Community Involvement Plan

A formal plan of communication and public participation activities developed by EPA to ensure opportunities for community members to learn more about Superfund site activities and provide input for decisions regarding the site. The plan is based on information collected through site-specific community interviews and a review of site-related documents. A community involvement plan is sometimes called a "community relations plan."

Expanded Site Investigation (ESI)

A technical study, usually involving collection and analysis of soil, sediment, and/or water samples, to gather sufficient information to determine whether a full-scale site investigation is necessary.

Feasibility Study (FS)

The second part of a two-part study called a remedial investigation/feasibility study. The feasibility study involves identifying and evaluating the most appropriate technical approaches to addressing contamination problems at a site. Alternatives are evaluated for their effectiveness in protecting human health and the environment.

Hazard Ranking System (HRS)

A numerical screening system used by EPA to evaluate the relative potential risks to public health and the environment from releases or threatened releases of hazardous substances from contaminated sites. Data from preliminary site investigations is used to develop a site score from 0 to 100 indicating the potential for substances released in groundwater, air, surface water, or soil to affect people on or near the site. The HRS ranking is the principal factor used to determine if a site requires further action under CERCLA and proposal to the National Priorities List.

Health Consultation

A review of available data by the Agency for Toxic Substances and Disease Registry (ATSDR) at EPA's request to determine if existing levels of contaminants and conditions at a site are creating a public health hazard that requires immediate action.

Information Repository

A file containing technical reports and reference documents regarding a Superfund site. The information repository is usually in a public building, such as a public school, city hall, or library, that is conveniently located for community residents. As the site proceeds through the Superfund remedial process, the file at the information repository may be updated.

National Priorities List (NPL)

EPA's list of top priority sites that present the greatest potential threat to human health or the environment. A site must be on the NPL to be eligible for federal funding from the Superfund trust for investigation and cleanup. Sites that qualify for the NPL based on the HRS score may be targeted for Superfund action without being listed on the NPL.

Potentially Responsible Party (PRP)

An individual, company, or organization that is considered potentially responsible for contamination as a result of owning, operating, transporting, or generating hazardous waste at a Superfund site. Whenever possible, EPA requires PRPs to pay for or conduct site investigation and cleanup activities instead of using federal funds.

Preliminary Assessment (PA)

The beginning phase of the Superfund process that evaluates hazardous waste sites to determine their threat to the public and the surrounding environment. A preliminary assessment is usually conducted within a year of site discovery.

Proposed Plan

A public participation requirement of CERCLA in which EPA summarizes for the public the preferred cleanup strategy, rationale for the preference, alternatives presented in the detailed analysis of the remedial investigation/feasibility study (RI/FS) and cleanup standards that will be applied. Public comment is sought on all the alternatives under consideration.

Public Comment Period

Time provided for the public to review and comment on a proposed EPA action or rule making after it is published.

Record of Decision (ROD)

A public document that explains the cleanup alternative selected by EPA for a Superfund site after the public comment period is concluded. The record of decision is based on information gathered during the remedial investigation and feasibility study for the site and reflects EPA's consideration of public comments and community concern regarding the site.

Remedial Investigation (RI)

The first of the two-part study known as a remedial investigation/feasibility study. The remedial investigation involves collecting and analyzing information about a site to determine the nature and extent of contamination that may be present. The risk assessment, conducted with the remedial investigation, determines how conditions at the site may affect human health or the environment.

Responsiveness Summary

A summary of oral and written comments received by EPA during a public comment period on key site-related documents, with EPA's responses to those comments. The responsiveness summary highlights community concerns to be taken into account by EPA in making decisions on a site and is a key part of the ROD.

Risk Assessment

An evaluation of the likelihood of exposure and potential magnitude of future health or environmental effects that could occur if no cleanup action is taken on a site. Risk assessment may include both qualitative (non-numerical) evaluation and quantitative (numerical) calculations based on specific assumptions about long-term exposure risks. Ecological risk assessment applies to animals, fish, vegetation, and other environmental receptors. Human health risk assessment estimates the potential effects on people. Risk assessment results are used to identify site cleanup requirements.

Site Inspection

A technical phase following the preliminary assessment of a site to collect additional information and samples to determine the nature and extent of contamination at a hazardous waste site.

Superfund

The trust fund established under CERCLA to pay for cleanup of abandoned hazardous waste sites if PRPs cannot be identified. Superfund is the common name for CERCLA and is often

used as an adjective for hazardous waste sites and the investigation and cleanup process directed by EPA.

Technical Assistance Plan (TAP)

The purpose of the Technical Assistance Plan is to increase the level of understanding and participation in the Remedial Investigation/Feasibility Study process among community members and provide independent technical review of site documents. As part of the Administrative Order by Consent between the City of Jacksonville and EPA, the City agreed to provide up to \$50,000 for a selected nonprofit community group affected by the Brown's Dump Superfund Site. With these funds, the community group is responsible for hiring and managing a Technical Advisor (independent from the City and EPA) to help them understand the data from the Remedial Investigation, the Risk Assessment, and the Feasibility Study. The community group is also responsible for disseminating information to the rest of the affected community. This program is similar to EPA's Technical Assistance Grant program, which is only available for sites listed on the National Priorities List. EPA's role in the Technical Assistance Plan is to oversee the City's administration of the Plan, and to ensure that it is consistent with protocol in the Administrative Order by Consent.